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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her  
guardian *ad litem* Maria Cadena,  
individually and as successor-in-interest  
to Hector Puga; I.H., a minor by and  
through his guardian *ad litem* Jasmine  
Hernandez, individually and as  
successor-in-interest to Hector Puga;  
A.L., a minor by and through her  
guardian *ad litem* Lydia Lopez,  
individually and as successor-in-interest  
to Hector Puga; and ANTONIA SALAS  
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY  
OF SAN BERNARDINO; S.S.C., a  
nominal defendant; ISIAH KEE;  
MICHAEL BLACKWOOD;  
BERNARDO RUBALCAVA; ROBERT  
VACCARI; JAKE ADAMS; and DOES  
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

*Honorable Kenly Kiya Kato*

**PLAINTIFFS' REQUEST FOR  
CONTINUANCE OF DEADLINE TO  
FILE REQUEST FOR DISMISSAL**

**TO THE HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

On May 23, 2025, Plaintiffs L.C., a minor by and through her guardian *ad litem* Maria Cadena; I.H., a minor by and through his guardian *ad litem* Jasmine Hernandez; A.L., a minor by and through her guardian *ad litem* Lydia Lopez; and Antonia Salas Ubaldo (“Plaintiffs”) and Defendants State of California, by and through the California Highway Patrol, Michael Blackwood, Isaiah Kee, and Bernardo Rubalcava (“State Defendants”), (collectively “the Parties”), filed a Notice of Settlement of the entire action. On that same day, the Court issued a Scheduling Notice and Order directing that by June 22, 2025, the Parties file either (1) a Stipulate of Dismissal under Fed. R. Civ. P. 41(a)(1)(A)(ii); (2) a Stipulation for an Order of Dismissal under Fed. R. Civ. P. 41(a)(2); or (4) a motion to reopen, and that failure to comply would result in this action being deemed dismissed as of June 23, 2025.

Because this case involves three minor plaintiffs, Plaintiffs are currently working on securing annuities in connection with the minors’ compromises. Plaintiffs are currently working through some issues in securing these annuities and need additional time in order to file a petition for the approval of the minors’ compromise. Accordingly, Plaintiffs respectfully request that the Court continue the deadline to file the Stipulation of Dismissal or motion to reopen 30 days to July 22, 2025 to give Plaintiffs sufficient time to work through these issues and to file their petition for approval of the minors’ compromises.

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1 Respectfully submitted,

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3 DATED: May 15, 2025

LAW OFFICES OF DALE K. GALIPO

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5 Bv /s/ *Hang D. Le*  
6 Dale K. Galipo  
7 Hang D. Le  
8 Attorneys for Plaintiffs  
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